UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

July 14, 2017

Mr. Craig Ziady
Cummings Properties, LLC
200 West Cummings Park
Woburn, MA 01801

Dear Mr. Ziady:

This letter is in response to the email dated July 6, 2017, from Mr. Mingolla requesting an extension for the submittal of the revised documents as set out in correspondence from EPA dated June 29, 2017. An extension to submit the revised documents and response to comments on or before August 4, 2017, is approved.

If you have any questions, please contact me at 617-918-1368 or casey.carolyn@epa.gov.

Sincerely,

Carolyn J. Casey
RCRA Facility Manager

cc: A. Zucker, EPA

And:

$$\text{LADE} = \frac{\text{EPC x Exposure Frequency x Exposure Duration x Exposure Period}}{\text{Lifetime Averaging Period x Conversion Factor}}$$

where:

EPC = Exposure Point Concentration ($\mu g/m^3$)
Exposure Frequency = 12 hours per day
Exposure Duration = 250 days per year
Exposure Period = 30 years
Lifetime Averaging Period = 70 years
Conversion Factor = 8760 hours/year

ADEs were calculated for evaluation of non-carcinogenic effects associated with short-term exposures (i.e., less than 10 percent of a lifetime, or seven years). Chronic LADEs were calculated for the evaluation of carcinogenic effects that occur over a period of 30 years. The exposure frequency of 12 hours per day and exposure duration of 250 days per year are assumed to be overly conservative. The duration assumes a school or daycare child or worker will be present for five days per week (Monday thru Friday) for a total of 50 weeks of the year. The frequency assumes the child or worker will be present for up to 12 hours each day, which is typically much more than the standard 8 hour per day commercial scenario. It is understood that some child day cares are open more than 8 hours per day and children can be present at these day cares for up to 12 hours per day.

6.2.4 Exposure Points and Exposure Point Concentrations

The exposure point concentration (EPC) provides an estimate of the constituent concentration that a receptor would potentially contact at an exposure point over the period of exposure. EPCs were based on the maximum and average concentrations detected in indoor air (samples collected between September 2012 and August 2015). Refer to **Table 3** for the summary of the air sampling results. Individual analyte maximum and average concentrations for all analytes were determined. These concentrations are documented in **Tables 7-8**. For the maximum and average concentrations, two sets of EPCs were established: one set of EPCs represent the concentrations of detected compounds only; and the second set of EPCs represents all compounds analyzed and if a compound was not detected, the EPC value represents one-half of the analytical detection limit. For risk only due to potential vapor intrusion, EPCs were established for the 16 compounds identified in **Table 5**; these maximum and average EPCs are shown in **Tables 9-10**.

6.3 Dose-Response Assessment

The dose-response assessment describes the observed effects in humans and/or laboratory animals associated with particular exposures of COCs. Toxicity information is used to quantitatively characterize the relationship between the dose of a constituent and the incidence of adverse health effects in an exposed population. EPA has published chemical-specific Reference Concentrations

Cummings Properties

www.cummings.com

BY E-MAIL - casey.carolyn@epa.gov
April 24, 2017

Carolyn J. Casey
EPA RCRA Facility Manager
US EPA Region 1
5 Post Office Square, Suite 100
Mail code OSRR 07-3
Boston, MA 02109-3912

Re: Former USM Facility, Beverly, MA; RCRA-01-2017-0023

Dear Carolyn:

Further to our discussions and to the Administrative Order on Consent (the "Order"), we enclose (in a series of successive emails due to the file sizes) the following items, all dated April 4, 2017:

1. Quality Management Plan ("QMP");
2. Health and Safety Plan ("HASP");
3. Quality Assurance Project Plan ("QAPP"); and
4. Revised Sampling and Analysis Plan ("SAP") for Elliott Landing.

We continue to work on the Written Proposal, which we expect will be submitted within the next couple of weeks.In addition, pursuant to Section VIII.14 of the Order and as set forth in the enclosed QMP, the contractor for this project will be FSL Associates, 358 Chestnut Hill Avenue, Boston, MA 02135 ("FSL"). FSL's qualifications are contained in the QMP.

Respondents' Project Coordinator will be Gregory Flaherty, P.E., Cummings Properties, LLC, 200 West Cummings Park, Woburn, MA 01801, 781-932-7030, gxf@cummings.com. His *curriculum vitae*, as well as his certification of the enclosed documents, is annexed hereto.

Please let me know if you have any questions. Thank you.

Very truly yours,

Craig J. Ziady
General Counsel

cc: Bruce A. Hoskins, P.E., LSP
Gregory Flaherty, P.E.

CERTIFICATION OF PROJECT COORDINATOR

I, Gregory Flaherty, P.E., hereby certify under penalty of law that the enclosed documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____
Name: Gregory Flaherty, P.E._____
Title: Project Coordinator_____
Date: April 24, 2017_____

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